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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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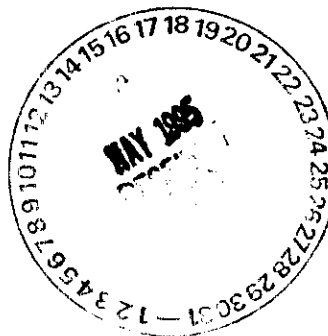
April 28, 1995

Mr. John Wagoner, Manager
United States Department of Energy
P. O. Box 550
Richland, WA 99352

Dr. LeMar Trego, President
Westinghouse Hanford Company
P.O. Box 1970
Richland, WA 99352

Mr. Joe F. Nemec, President
Bechtel Hanford Company
P. O. Box 969
Richland, WA 99352

Dr. William J. Madia, Director
Pacific Northwest Laboratory
P. O. Box 999
Richland, WA 99352



Dear Messrs. Wagoner, Trego, Nemec, and Madia:

This letter transmits the Dangerous Waste Portion of the Hanford Facility Wide *Resource Conservation and Recovery Act* Permit for the Treatment, Storage, and Disposal of Dangerous Waste (the Permit), as modified in accordance with the Washington State Department of Ecology's (Department) letter dated January 4, 1995.

The enclosed package includes, in addition to the modified Permit, the following documents:

The Public Comment Responsiveness Summary (Attachment 1):

This document lists the Department's responses to all public comments received during the public comment period on the proposed modifications to the Permit. It also includes the changes made



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to the proposed modifications in response to these comments. The issues raised by these comments and the respective responses will be included in the Permit Implementation Guidance Manual

List of Class 1 Modifications Initiated by the Department (Attachment 2):

In addition to the five major modifications made to the Permit, minor (Class 1) modifications were also made to this Permit as necessary in conjunction with the major modifications made, such as references within the Permit to the newly introduced chapters in Part V of the Permit and in the Table of Contents. Other minor changes listed in this document were made to reflect administrative changes, such as names and phone numbers of points of contact mentioned in the Permit.

Errata Sheet for Class 1 Modifications Initiated by the Permittees (Attachment 3):

This document lists the Class 1 modifications made by the Permittees since September 1994, of which the Department was notified in the Permittees' letter dated January 9, 1995, in accordance with Permit Condition I.C.3. These changes were approved and accepted as Class 1 modifications

Permit Applicability Matrix (Attachment 4):

This applicability matrix was issued with the Permit in August 1994 to clarify the applicability of the Permit Conditions to the various types of units and areas on the Hanford Facility Site. This matrix has now been modified to include the five new units undergoing closure added to the Permit through this modification.

The Closure Plans of the five new units added to the Permit through this modification are approved for implementation. This modified Permit will be effective one month from April 28, 1995. The Permittees must complete the closure activities as described in the approved closure plans within 180 days from the effective date of this modified Permit.

The Hanford Facility Wide RCRA Permit has proven to be an effective tool to guide the management of the dangerous and mixed waste on this facility, and the closure of the inactive units in it. The Department appreciates the efforts of Permittees' staff in the implementation of the Permit and their cooperation in facilitating its modification.

Public Comment Responsiveness Summary (Attachment 1)

The following are the comments submitted by the U.S. Department of Energy on the Draft Modification Package submitted for public review on January 17, 1995, of the RCRA Permit for the Treatment, Storage, and Disposal of Dangerous Waste for the Hanford Facility (Permit). The following also includes the Washington State Department of Ecology's (Department) responses to these comments and the resulting changes in the proposed modification, if any are warranted.

Comment #1

Condition:

V.4.A. Compliance with Approved Closure Plan

Requested Action:

Delete.

Commenters' Justification:

This condition, which applies to the Simulated High-Level Waste Slurry Treatment and Storage (SHLWS T/S), includes incorporation of references. References were not included in unit-specific chapters in the Permit nor are references proposed in the unit-specific chapters for the four other units being incorporated in the Permit during this modification.

Inclusion of references in the Permit will necessitate a permit modification whenever the reference document is modified or changed. Previous negotiations on the issue of inclusion of Permit application and closure plan references as permit conditions, resulted in the exclusion of references.

The documents referenced in the permit conditions already are included in the Permit administrative record.

Department Response:

The Department agrees the inclusion of "reference documents" in the Permit may result in a considerable administrative burden on all concerned parties. The Department also agrees that, in this specific case, all the referenced documents are included in the Hanford Facility Administrative Record, and hence will be deleted from the SHLWS unit specific chapter. Nevertheless, the Department will leave the decision on the inclusion of such references in the future modifications to be made on a case-by-case basis, which is consistent with the final negotiated position on this issue. In the future, this issue will be finalized prior to the preparation of the unit-specific conditions to be included in the Permit.

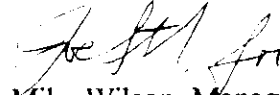
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If you have any questions about any of the above or any of the enclosed attachments, please call Moses Jaraysi, of my staff, at (509)736-3016.

Sincerely,



Mike Wilson, Manager
Nuclear Waste Program

MW:MJ:mf
Attachments

cc: Cliff Clark, USDOE
Doug Sherwood, EPA
Daniel Duncan, EPA
Harold Tilden, PNL
L. A. Mehalik, BHI
Sue Price, WHC
Administrative Record: Hanford Facility Wide Permit

Permit Change:

Lines 23, 33, 35, 37, and 46, in Part V, Chapter 4 of the proposed modification will be deleted.

Comment #2

Condition:

V 4.B.c. Status of units between Permittees' submittal of certification and the Department's acceptance of certification.

Comment:

The requirement to continue addressing units as dangerous waste management units after certification of final closure is without regulatory basis.

Requested Action:

Delete the final sentence of the condition. Alternatively, replace the final sentence of the condition with the following language:

"If the Department determines that closure has not been performed in accordance with the approved closure plan, the Permittees will be notified in writing within sixty (60) days."

Commenters' Justification:

The Permittees are entitled to a presumption the site is clean given Ecology's prior approval of the plan and the independent evaluation of the cleanup as it occurs. The WAC 173-303 provides for dangerous waste management requirements based on active management. The WAC 173-303-040 defines "active life" as "the period from the initial receipt of dangerous waste until the department receives certification of final closure." The active life of a TSD unit is discontinued at the time Ecology receives certification. There is no regulatory provision that requires the TSD owner/operator to continue managing the closed area as though it were still an active TSD unit beyond certification of closure. Ecology retains the authority to dispute the closure, if closure has not been accomplished pursuant to the approved closure plan, but there is no authority to require continued management of the closed TSD unit as a dangerous waste management unit beyond what is mandated in the regulations.

Department Response:

The Department agrees with the facts put forward in the justification of the comment regarding "the lack of authority to require continued management of the closed TSD unit as a dangerous waste management unit." The Department did not intend for the permittees to "manage" the unit as dangerous waste management units after submittal of the certification of closure, but to "address" the unit as a dangerous waste management unit. The reason for this condition is the

fact that the status of the unit remains "active" as a dangerous waste management unit until the Department reviews the certification documents and approves the change of the status of the unit to "in-active", i.e., closed.

Hence, these units will be addressed as "dangerous waste management units" until the certifications are approved, but the management requirements, such as periodic inspections, reporting, etc., will not be enforced during this period, except in cases which may warrant the implementation and enforcement of specific dangerous waste requirement(s) during this period, and such requirement(s) will be enforced through a separate unit specific condition(s) in the Permit.

Permit Change:

No change required.

Comment #3

Condition:

V.4.B.d. Closure Schedule

Requested Action:

Delete and replace with the following text

"The Permittees shall complete closure plan activities within the time frame specified in the approved closure plan."

Commenters' Justification:

By approving the closure plan, Ecology has approved the closure schedule in Revision 6A of the closure plan. Ecology has included Section 6.1 of the approved closure plan as an enforceable provision, which includes the closure schedule for the SHLWS T/S unit.

Department Response:

This particular closure plan, and the other four closure plans being introduced to the Permit, have identified schedules which comply with the WAC 173-303-610(4)(b) requirement to complete the closure activities within 180 days after approval of the closure plans. Closure Schedules will be emphasized in permit conditions only if they exceed the 180 day limit and call for an extension beyond this period due to either the physical characteristics of the unit being closed or other reasons considered by the department to allow such an extension. Calling out the closure schedules in this case, for these five closures, as requested by the commenter, may imply to the reader an extended schedule of closure activities, and cause confusion to parties implementing these closure plans.

Permit Change:

No change required.

Comment #4

Condition:

V.4.B.e. (Lines 22, 23, 24, 25, 26, and 27)

Comment:

The proposed permit condition is beyond the scope of the Permit and unnecessary because the management of solid waste is adequately regulated under current requirements.

Requested Action:

Delete and replace with the following text

"Any remaining solid waste at the unit, generated during soil sampling and decontamination activities, shall be designated according to the analytical results of these activities and managed accordingly. The department shall be informed in writing of the final disposition of the waste."

Commenters' Justification:

The container is not marked as hazardous waste because the designation of the solid waste has not been determined. The new text specifies the activities that generated the waste and more clearly defines the basis that will be used to designate waste as dangerous or non-dangerous solid waste. The proposed language would artificially raise the closure cost due to the increased cost of managing the container as dangerous when analytical may show it non-dangerous.

Department Response:

The proposed text agrees with the intent of condition V.4.B.e. as it is in the proposed modification. The exact language used in the condition reflects the fact that the analytical data resulting from the sampling of the drum in question had not been available at the time of writing the condition. Now that the results are in hand and indicate the absence of dangerous waste in the drum, the Department accepts the commenters' request to replace the text of the condition to read as proposed in this comment.

It is important for the Department to clarify a general point in relation to this issue. In the process of closure activities, including sampling events, if there is any indication the generated waste resulting from these activities contains dangerous waste, the owner/operator of the unit must manage the waste as dangerous waste until the analytical data is available to properly designate the waste and manage it accordingly.

Permit Change:

This condition will read as follows:

"Any remaining solid waste at the unit, generated during soil sampling and decontamination activities, shall be designated according to the analytical results of these activities and managed accordingly. The Department shall be informed in writing of the final disposition of the waste."

Comment #5

Condition:

V.5.B.e. (Lines 36, 37, 38, and 39)

Comment:

The requirement to continue addressing units as dangerous waste management units after certification of final closure is without regulatory basis.

Requested Action:

Delete the final sentence of the condition. Alternatively, replace the final sentence of the condition with the following language:

"If the Department determines that closure has not been performed in accordance with the approved closure plan, the Permittees will be notified in writing within sixty (60) days."

Commenters' Justification:

Refer to Condition V.4.B.c., Justification.

Department Response:

Refer to the Department's Response to Comment #2.

Permit Change:

No change required.

Comments #6 and #7

Condition:

V.6.B.e. (Lines 36,37, 38, and 39)

V.7.B.c. (Lines 44, 45, and 46)

Comment:

See Comment #2.

Department Response:

See Department's Response to Comment #2.

Permit Change:

No change required.

Comment #8

Condition:

V.8.A. (Lines 18 through 30)

Requested Action:

Delete and replace with the following

<i>Part A</i>	<i>Part A Permit Application, Form 3</i>
<i>Section 2.3</i>	<i>Security</i>
<i>Section 5.1</i>	<i>Interim-Status Period Groundwater Monitoring</i>
<i>Section 6.0</i>	<i>Closure Performance Standards</i>
<i>Section 7.0</i>	<i>Closure Activities</i>
<i>Section 8.0</i>	<i>Postclosure</i>

Commenters' Justification:

(1) Do not add Section "Closure Strategy." This information is a duplication of detailed information already provided in Chapters 6.0 and 7.0.

(2) Replace Chapter 2.0 "Facility Description and Location Information" with Chapter 2.0, Section 2.3 "Security." Most of Chapter 2.0 is background information. The "Security" section is the only section that lists enforceable activities.

(3) Replace Chapter 5.0 "Groundwater Monitoring" with Chapter 5.0, Section 5.1 "Interim-Status Period Groundwater Monitoring." The remainder of Chapter 5.0 describes the regional setting (including climate, geology, and hydro-geology information).

(4) Addition of Chapter 8.0 "Postclosure." Describes action to be taken if clean closure cannot be achieved and it states that if clean closure cannot be achieved, the closure plan will be revised. Chapter 8.0 describes enforceable activities.

Department Response:

Both the Part A and Section 8.0 are included in this condition as enforceable portions of the Closure Plan.

The Department believes all the sections made enforceable in this condition include pertinent information. The Department agrees some duplication of information may occur between different sections of the closure plan, nonetheless, it is essential to enforce required information which may not be possible to capture without including duplicated information from other sections.

Also, the fact that this unit was historically linked to the 216-BP-11 (Main Pond), it is of importance the Facility Description and Location Information Chapter is well detailed and inclusive of all the pertinent information.

The regional information detailed in Chapter 5.0, especially the hydrology information, is very important considering the unique configuration of hydraulic gradients at this location and the continued discharge of non-hazardous effluent to this unit after closure.

Permit Change:

No change required.

Comment #9**Condition:**

V.8.B.d. (Lines 4, 5, and 6)

Comment:

The requirement to continue addressing units as dangerous waste management units after certification of final closure is without regulatory basis.

Requested Action and Commenters' Justification:

See requested action and justification in Comment #2.

Department Response:

See Department's Response to Comment #2.

Permit Change:

No change required.

Comment #10

The Focus Sheet does not adequately address the fact Sheet/Statement of Basis requirements of WAC 173-303-840(2)(f). Ecology has decided to prepare a Statement of basis in lieu of a Fact Sheet for this modification. The WAC 173-303-840(2)(f)(iv) requires that the statement of basis describe "the derivation of the conditions of the draft permit and the reasons for them." For example, Ecology is requiring the Permittees to continue managing units as dangerous waste management units after closure in accordance with an approved closure plan. There is no regulatory basis for such a requirement.

Condition:

Ecology's Statement of Basis (Focus Sheet): Hanford's Hazardous Waste Permit Modification

Requested Action:

Provide a statement of basis that meets the requirement of WAC 173-303-840(2)(f)(iv). In addition, eliminate conditions for which there is no legal authority. Ecology should return to their practice of submitting a formal Statement of Basis.

Commenters' Justification:

The WAC-173-303-840 imposes procedural requirements upon Ecology for the decision making process. Ecology must comply with these requirements, including the requirement to provide a basis for proposed permit conditions.

Department Response:

The Focus Sheet included a background description of the Hanford Hazardous Waste Permit, a description of the modification process established by the permit, an explanation of why a Statement of Basis was prepared in lieu of a Fact Sheet, descriptions of the five closing units, an explanation of public involvement procedures, and an invitation to review and comment on the proposed modification. WAC 173-303-840(2)(f)(iv) requires the Department to prepare "a statement of basis for every draft permit for which a fact sheet is not prepared." In addition, the regulation further specifies that "the statement of basis shall briefly describe the derivation of the conditions of the draft permit and the reasons for them. ." It should be noted the Focus Sheet described the permit modification as introducing "the new conditions which pertain to the units to be closed in the relevant chapters." The Focus Sheet also indicated the Department initiated the modification and the five closure plans were determined to be complete and satisfactory. Therefore, the Department feels the Focus Sheet issued as a Statement of Basis fulfilled the intent of WAC 173-303-840(2)(f)(iv). Although the Focus Sheet indicated "all information in the repositories, plus the administrative record, including all data submitted by the applicants, may be reviewed . . . ," the Department concurs that the Focus Sheet could have more clearly described the administrative and technical review process by which the proposed permit conditions had been derived. Therefore, future Focus Sheets will include a description of the review process utilized to approve closure plans.

Regarding the Commenter's request the Department return to the practice of submitting a formal Statement of Basis, the Department recognizes the Focus Sheet as the formal Statement of Basis. The Department also recognizes that even though the Focus Sheet identified the document as a Statement of Basis, there may have been confusion regarding the title of the document as "Focus." It should be noted the Department has historically used the Focus Sheet title for its public involvement background information sheets. The name has provided a standard format for all of the agency's public information background sheets ranging from nuclear waste regulation to water quality protection. The name also has avoided any confusion with the term "Fact Sheet," which has different definitions under the state waste discharge permit regulations, state dangerous waste regulations, and the federal Comprehensive Environmental Response Compensation Liability Act. In the case of the February 1995 Hanford Hazardous Waste Permit modification, the Department believes the inclusion of the Statement of Basis in the public involvement Focus Sheet was an effective and cost-efficient way to inform the public. Therefore, to avoid future confusion regarding this issue, the Department will entitle such documents, as applicable, "Statement of Basis/Focus Sheet."

Regarding the Commenter's request that permit conditions for which there is no legal authority be eliminated, it should be noted the Statement of Basis is typically a brief document intended to describe the derivation of the conditions of the draft permit/permit modification. The Department feels this issue is best addressed on a unit-specific basis. In addition, the Department also recognizes the same comment was previously submitted by the same Commenter regarding the Simulated High Level Waste Slurry Treatment and Storage Unit. Therefore, the Department's response to this particular issue will not be addressed here, and the Commenter is directed to the Department's response for the appropriate comment.

Permit Change:

No change required.

Comment #11

In the discussion of Chapter 4 for the Simulated High Level Waste Slurry T/S Unit, Ecology erroneously identified the SHLWS as mixed waste. The use of this term in connection with the SHLWS is incorrect and conflicts with WAC 173-303-040.

Requested Action:

Retract the statement from the Statement of Basis (Focus Sheet) that states that the SHLWS was mixed waste.

Commenters' Justification:

The WAC-173-303-040 defines mixed waste as, a dangerous, extremely hazardous, or acutely hazardous waste that contains both a nonradioactive hazardous component and, as defined by 10

CFR 20.3 source, special nuclear, or by-product material subject to the Atomic Energy Act of 1954 (42 U.S.C. 2011 et seq.) (emphasis added). The SHLWS did not contain source, special nuclear, or by-product material and hence cannot be categorized as mixed waste.

Department Response:

The Department concurs with the Commenter. The reference to the waste managed at the SHLWS Unit as mixed waste was in error. The Department will issue a correction of the description in the HANFORD UPDATE.

Permit Change:

No change required.

Comment #12

In the discussion of Chapter 4 for the SHLWS T/S Unit, Ecology erroneously identified the unit as a "small open area of 9622 square yards." The statement incorrectly identifies the SHLWS T/S unit that is to be addressed by the closure plan.

Condition:

Ecology's Statement of Basis (Focus Sheet), Hanford's Hazardous Waste Permit Modification

Requested Action:

Delete the line in the SHLWS T/S portion of the focus sheet that states, "Located in the 3000 Area in Richland, this unit is a small open area of 9622 square yards." Alternatively, replace it with the following language:

"Located in the 3000 Area of North Richland, this unit consists of three small open areas of approximately 755 square yards."

Commenters' Justification:

The focus sheet inappropriately identifies the fenced 1234 yard as the area to be addressed by the closure plan. The closure plan actually addresses the closure of the three areas, identified in the current Part A Permit Application, Form 3 for the unit, within the 1234 yard.

Department Response:

The Department concurs with the Commenter. The description of the unit in the Focus Sheet was in error. The Department will issue a correct description in the HANFORD UPDATE.

Permit Change:

No change required.

List of Class 1 Modifications Initiated by the Department (Attachment 2)

The following changes (Class 1 Modifications) have been made to the Dangerous Waste Portion of the Hanford Facility Wide RCRA Permit (Permit), in conjunction with all Class 3 modifications.

1. The Page block has been changed to reflect Revision 1.
2. The Table of Contents has been modified to reflect the addition of the five new chapters to Part V. of the Permit.
3. The List of Attachments has been moved to Page 4, immediately following the Table of Contents.
4. The List of Attachments has been modified to include the five new closure plans to Part V. of the Permit.
5. The Modified Permit Applicability Matrix has been modified to include the five new chapters in Part V. of the Permit.
6. Page 1, Line 46. The signature authority has been changed to reflect the name of the new Program Manager for the Department.
7. Page 1, Lines 37 - 40. This sentence was modified to reflect the Revision 1 effective date.

Attachment 3

**ERRATA SHEET FOR CLASS 1 MODIFICATIONS
INITIATED BY THE PERMITTEES**

The Permittees notified the Washington State Department of Ecology (the Department) of quarterly Class 1 modifications in a January 9, 1995, letter. As allowed by the regulations, these modifications have already been implemented. However, a notification to the Department is required pursuant to Facility Wide Permit Condition I.C.3. The Department has reviewed the notification and determined the modifications are consistent with regulatory requirements and do not result in an increased threat to human health or the environment.

As a result of the notification, the changes in this errata sheet must be made to the Facility Wide Permit. The changes listed below within items 1 and 2 require each person responsible for maintaining a copy of the Permit to remove and/or add new pages to the Permit. New pages to be added are enclosed with this errata sheet. Pages to be removed may be discarded. The changes listed below for items 3, 4, 5, and 6 require the addition of Conditions to the Permit. The Department has already added these Conditions as part of Revision Number 1 to the Permit. Therefore, those responsible for maintaining a copy of the Permit need only ensure they have Revision Number 1 (or later version) of the Permit.

Required Changes

1. Changes to the 616 NRDWSF Permit Application

The following page changes must be made to the 616 NRDWSF Permit Application (Attachment 8 of the Permit):

Remove Pages F2-5 and F2-6 and replace with the revised Pages F2-5 and F2-6 in Enclosure 1.

Add Chapter 3.0 (Enclosure 2) to Attachment 8.

Remove Page F3-3 and replace with the revised Page F3-3 in Enclosure 3.

Remove Page F6-2.2 and replace with the revised Page F6-2.2 in Enclosure 4.

Remove Page F6-3 and replace with the revised Page F6-3 in Enclosure 5.

In Appendix 4B, remove Drawing H-6-1556 (Rev 2) and replace it with Drawing H-6-1556 (Rev 4) and the four Engineer Change Notices in Enclosure 6.

Remove Appendix 7A and replace with the revised Appendix 7A in Enclosure 7.

2. **Changes to the 305-B Storage Facility Permit Application**

The following page changes must be made to the 305-B Permit Application (Attachment 18 of the Permit):

Remove Pages 3-1 through 3-4 and replace with revised Pages 3-1 through 3-4c in Enclosure 8.

Insert Page 4-9a (Enclosure 9) after Page 4-9.

Remove Pages 4-15 and 4-16 and replace with the revised Pages 4-15 and 4-16 in Enclosure 10.

Remove Figure 4-9 and replace with the revised Figure 4-9 in Enclosure 11.

Remove Table 4-2 and replace with the revised Table 4-2 in Enclosure 12.

3. **Changes to the Facility Contingency Plan Conditions**

The following Condition has been added to Part II of the Permit:

II.A.5. The Contingency Plan, as provided in Attachment 4, shall be modified as follows:

Page APP 7A-2, lines 2 and 49 The emergency telephone number "811" shall be replaced with "911."

Page APP 7A-3, lines 45 through 48. The emergency telephone number "811" shall be replaced with "911."

Page 7A-T1, lines 11 through 12. The term "Emergency Management Center Location: 1170 Building" shall be replaced with "Site Operation Team Location: Federal Building, Richland."

4. **Changes to the Permit Applicability Matrix**

The Permit Applicability Matrix (Attachment 3 to the Permit) has been modified to add Condition II.A.5. and assign "*"s to Categories D, E, and F.

5. **Changes to the 616 NRDWSF Conditions**

The following Conditions have been added to Part III, Chapter 1 of the Permit:

- III.1.B.jj. Part A Application, page 4 of 24, lines 18 and 19. Waste Code WC01 shall be deleted and the estimated annual volume of Waste Code WC02 shall be changed to 55,000 kilograms.
- III.1.B.kk. Page 2-8, line 3 The following sentence shall be added: "A mechanical fork truck lift and associated safety equipment (guards, handrails, etc.) are mounted on the containment pad. Design drawings of the mechanical fork truck lift are provided in Appendix 4B."
- III.1.B.ll. Page 2-16, lines 30 and 32 The address "7601 West Clearwater, Suite 102" shall be changed to "1315 West Fourth Avenue" and the telephone number "509-546-2990" shall be changed to "509-735-7581."
- III.1.B.mm. Page 2-18, line 38. The following bullet shall be added: "● Evidence tape from field verified waste is untampered."
- III.1.B.nn. Page 3-1, lines 12 through 14 The sentence beginning with "Nonradioactive dangerous waste . . ." shall be deleted and replaced with the following: "The 616 NRDWSF stores nonradioactive dangerous waste that is received from generating units located on the contiguous Hanford Facility and from DOE-RL owned and operated generators located on noncontiguous areas near the Hanford Facility (e.g., Federal Building and 712 Building in downtown Richland and the 3000 Area). This waste is stored at the 616 NRDWSF until it is transported to an offsite TSD facility."
- III.1.B.oo. Page 3-1, line 20. The term "onsite" shall be deleted and replaced with "DOE-RL owned and operated."
- III.1.B.pp. Page 3-1, lines 21 and 22. The sentence "Shipments are made from onsite generating units to the 616 NRDWSF." shall be deleted.
- III.1.B.qq. Page 3-1, line 22. The term "onsite" shall be deleted and replaced with "Hanford Site." On line 26, the term "generated onsite" shall be deleted.
- III.1.B.rr. Page 3-2, lines 14 and 19. The term "Onsite" shall be deleted.
- III.1.B.ss. Page 3-3, lines 31 through 39. The paragraph on these lines shall be deleted.

- III.1.B.tt. Page 3-4, lines 3 and 16. The term "onsite" shall be deleted.
- III.1.B.uu. Page 3-5, lines 19, 36, 38, and 44. The term "onsite" shall be deleted.
- III.1.B.vv. Page 3-6, lines 13, 15, 19, 23, and 24. The term "onsite" shall be deleted.
- III.1.B.ww. Page 3-7, line 32. The term "suction pump" shall be added after the word "device."
- III.1.B.xx. Page 3-8, line 8. The term "onsite" shall be deleted.
- III.1.B.yy. Page 3-8, lines 37 through 40. The paragraph on these lines shall be deleted and replaced with the following: "All waste received at the 616 NRDWSF, as described in Section 3.1, is subject to the confirmation of designation sampling requirements described in Section 3.2. Each shipment of waste received at the 616 NRDWSF must be accompanied by accurate and complete waste tracking forms for waste received from onsite sources and uniform hazardous waste manifests for waste received from offsite sources "
- III.1.B.zz. Page T4-2, line 31. The word "cabinet" shall be replaced with "cabinet(s)."
- III.1.B.aaa. Page T4-2, line 34. The following option shall be added:
 "or 34 (55 gal) 34 (30 gal)
 (208.2 liters) (113.6 liters)
 2 Flammable liquid
 storage cabinets
 (170 gal) (1,024 liters)".
- III.1.B.bbb. Page APP 4B-ii. On line 12, the term "Rev. 2" shall be replaced with "Rev. 4." At line 13, the following shall be added:
 "ECN 191786 (10/28/93)
 ECN 176589 (11/16/93)
 ECN 605639 (01/17/94)
 ECN 605649 (08/01/94)"

6. **Changes to the 305-B Storage Facility Conditions**

The following conditions have been added to Part III, Chapter 2 of the Permit:

- III.2.B.bb. Part A Application, Page 3Q of 5, lines 10 and 11. Waste Code WC01 shall be deleted and the estimated annual volume of Waste Code WC02 shall be changed to 2,000 kilograms.

- III.2.B.cc. Page 2-15, lines 30 and 31. The term "1988" shall be changed to "1991."
- III.2.B.dd. Page 4-17, lines 23-36. The text on these lines shall be deleted and replaced with the following: "4.1.1.6.11 RMW Storage Area. Radioactive mixed waste that is not flammable per UFC (i.e., flash point above 100 degrees F) is stored in a special area in the basement of 305-B. For additional segregation capability, there are six small chemical storage cabinets and four 5 ft. X 5 ft. stainless steel "container pans" with 12 in. sides. The containment pans are mounted to the floor or wall of the cell to provide segregated storage for potentially incompatible mixed waste streams. Drums stored in this area are stored on pallets to prevent potential contact with spilled waste in containment during an emergency. A diagram of this area is provided in Figure 4-9."
- In normal use, the storage capacity of this area is limited by the radionuclide limits imposed by the DOE for "low inventory facilities." These limitations are defined in DOE-STD-1027-92, Hazard Characterization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports, and are included in the radiation waste permit for the mixed waste storage area."
- III.2.B.ee. Page 6-1, lines 46-52. The paragraph beginning with the word "Access" shall be deleted.
- III.2.B.ff. Page 6-3, lines 15-18. The first two sentences of this paragraph shall be deleted.
- III.2.B.gg. Page 6-16, lines 15-19. The first five bullets shall be deleted and replaced with the following: "● 6 sets of chemically resistant suits, aprons, boots, and gloves".
- III.2.B.hh. Page 7-17, lines 5-9. The first five bullets shall be deleted and replaced with the following: "● 6 sets of chemically resistant suits, aprons, boots, and gloves".
- III.2.B.ii. Page 8-3, line 24. The following shall be added to the text: "Equivalent training may be taken in place of the training identified in Figure 8-1 with approval from the 305-B Unit Operating Supervisor or the Waste Management Section Manager. Documentation of the training substitution will be placed in the operating record (within seven (7) days after the training was received), accompanied by a narrative explanation, and the date of the training. The documentation shall be made available to the Department or EPA during inspections for assessment. If the Department

or EPA determines that the training substitution was not equivalent to the original, the original training will be taken or an acceptable substitution will be found."